UNITED STATES STEEL CORPORATION
USS ENGINEERING

PLANT ENGINEERING
GARY WORKS

October 24, 1980

MEMORANDUM

DRUM HANDLING PROCEDURES
GARY WORKS HAZARDOUS WASTE PROGRAM

On May 19, 1980, the United States Environmental Protection Agency ("U.S.E.P.A.") published extensive regulations concerning the management of hazardous waste. These regulations apply to all persons who generate, transport, store, treat, or dispose of hazardous waste.

Under these regulations, any container (drum) used to hold a hazardous material is considered to be a hazardous waste upon its disposal. (See attachment #1 for a list of current hazardous drums.) It is estimated that annually, a maximum of 6000 hazardous drums may be generated at Gary Works.

The following handling procedures (attachment #2) will be followed to facilitate compliance with this regulation.

No. 1 Labeling

A. Purchasing, through a standard clause in the purchase order agreement, will have each chemical manufacturer label all chemical drums and invoices accompanying each shipment received as containing a hazardous or non-hazardous material under the Resource Conservation Recovery Act (R.C.R.A.) regulations. If hazardous, the label should include the pertinent R.C.R.A. classification number. No drums may be accepted by Gary Works unless the above information is included.

No. 2 Internal Manifest System

A. An internal manifest will be required for movement of drums containing hazardous chemicals under R.C.R.A., through Gary Works. This manifest will be initiated by accounting, through the applicable receiving authority or operating division upon receipt from the vendor of the material. The purpose of this manifest is to chart the course of the drums until deposition at the drum storage area. Annual Reports filed To EPA, required by RCRA

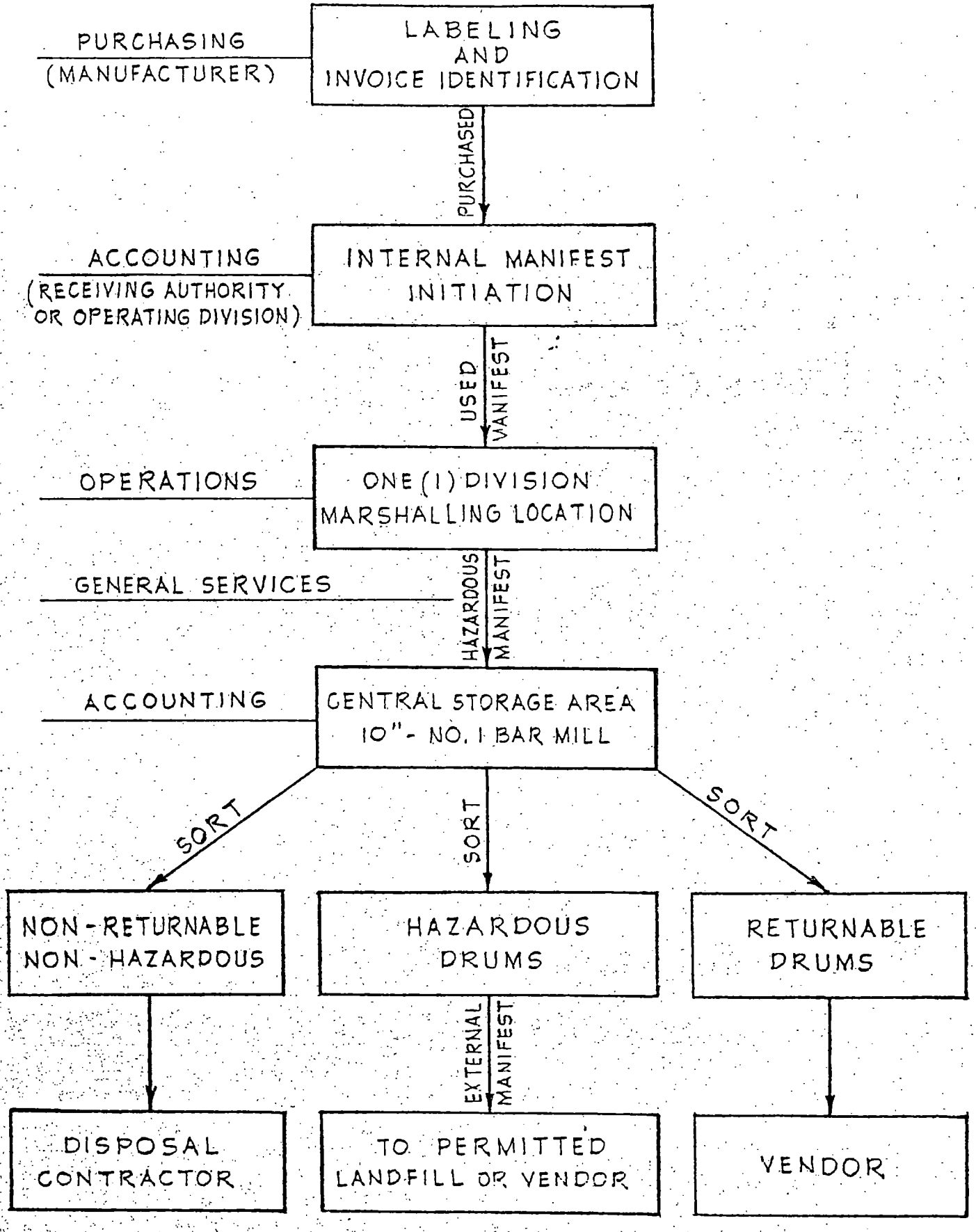
No. 3 Division Marshalling Location

A. Each operating division must designate one (1) marshalling location for storage of all drums, both hazardous and non-hazardous prior to disposal. All drums must be emptied and if applicable, ends attached prior to storage. All drums will be transported from this location to a new drum storage area located in the 10" - #1 Bar Mill Hot Bed Building. The transportation of the hazardous drums will be a manifested activity.

ATTACHMENT NO. 1

| Division | Present Hazardous Drums |
|---|---|
| Tube Works | Turco Alk<br>Turco Caustic |
| Hot Rolling | Chlorothene<br>Tretolite |
| Central Maintenance | Chlorothene<br>Inhibisol<br>Rominda<br>Biocides |
| Tin & Stainless | Hydrofluoric<br>Caustic Soda<br>Sodium Bichromate |
| Steel Producing | Chlorothene<br>Fyrquel |
| Energy | Chlorothene<br>Nalco 354<br>Nalco 356<br>Nalco 464<br>Nalco 8355<br>Nalco 8940<br>Inhibisol |
| Iron Producing | Chlorothene |
| Primary Mills | Chlorothene<br>Inhibisol |
| Coke and Chemicals | Chlorothene<br>Acetone<br>Tolune<br>Xylene<br>Tretolite |

ATTACHMENT NO. 2



HAZARDOUS WASTE MANAGEMENT FACILITIES
DAILY INSPECTION LOG (PART 265.15)

USSC - GARY WORKS

PLANT ENGINEERING

| FACILITY DESIGNATION | TIME | STATUS | AREAS OF DEFICIENCY 1 | 2 | 3 | 4 |
|---|---|---|---|---|---|---|
| HWS-2 East End Waste Acid Pit | | | | | | |
| HWS-3 Waste Acid Storage Tanks | | | | | | |
| HWS-4 West End Acid Pit | | | | | | |
| HWS-5 Old Pickle Tank | | | | | | |
| HWS-7 W.P.L. Storage Tank | | | | | | |
| HWS-8 W.P.L. Storage Tank | | | | | | |
| HWS-9 No. 1 EGL Basement Sump | | | | | | |
| HWS-10 Met. Lab Acid Storage Tank | | | | | | |
| HWS-11 North WPL Pit and Pump Station | | | | | | |
| HWS-12 South WPL Pit and Pump Station | | | | | | |
| HWS-13 S-1 Pump Station | | | | | | |
| HWS-15 T-1 Pump Station | | | | | | |
| HWS-16 #7 Cleaning Line Caustic Holding | | | | | | |
| HWS-25 TTP Oil Storage Tank | | | | | | |
| HWS-26 ST-17 Oil Holding Tank | | | | | | |
| HWS-31 Barrel Storg. Building | | | | | | |
| HWT-1 Waste Acid Treatment Plant | | | | | | |
| HWT-2 Neutralized Waste Acid Lagoons | | | | | | |
| HWT-6 Terminal Treatment Plant | | | | | | |
| HWT-7 Chrome Treatment Plant | | | | | | |
| HWT-10 ST-17 Final Oil Separators | | | | | | |
| HWT-13 TTP Sludge Drying Beds | | | | | | |
| HWT-14 ST-17 Sludge Drying Beds | | | | | | |
| HWD-1 Off-Spec. Pitch Pile | | | | | | |
| HWD-2 Tar Sludge Impoundment | | | | | | |
| HWD-5 Hazardous Waste Landfill | | | | | | |
| HWD-9 Deep Well | | | | | | |

DATE:

DEFICIENCY LEGEND

1. Containment: Any leakage or failure of facility to properly contain hazardous waste.
2. Structural Condition: Physical damage or deterioration of facility.
3. Ancillary Equipment: Leakage or deterioration of piping, valves, pumps, etc.
4. Waste Level: Insufficient freeboard or possibility of tank overflowing.

COMMENTS:

INSPECTOR'S SIGNATURE: